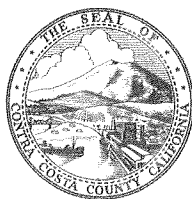


Community Development Department

County Administration Building
651 Pine Street
4th Floor, North Wing
Martinez, California 94553-0095

Phone: (925) 335-1272

Contra Costa County



Dennis M. Barry, AICP
Community Development Director

September 30, 2004

Department of Water Resources
Division of Planning and Local Assistance
Attn: Tracie Billington
PO Box 942836
Sacramento, CA 94236-0001
Email to: tracieb@water.ca.gov

To Ms. Billington:

I am writing on behalf of the Contra Costa County Water Agency and Contra Costa County Community Development Department to provide comments on the Public Draft (8/16/04) Integrated Regional Water Management Grant Program Guidelines for Proposition 50, Chapter 8.

1) **IRWM Plans and functional equivalents:** This phrase should be used consistently throughout the document. In the beginning of the document, or in Appendix D it would be helpful to list examples of what might pass as a functional equivalent. For example: "Functional equivalents may be a stand alone comprehensive plan, or a collection of more focused regional plans. Such plans could include: Habitat Conservation plans, Natural Community Conservation plans, Urban Water Supply plans, Flood Control plans, etc..."

Specifically we would like to request that regional Habitat Conservation Plans and Natural Community Conservation plans are explicitly listed as appropriate functional equivalents – or that they may serve as a component of a functional equivalent. Such plans consider ecological requirements associated with growth pressures in a comprehensive way, and are an important component of regional water management.

2) **Regions in the SF Bay Area:** The San Francisco Bay Area/Delta is a large and geographically-diverse area. Although efforts are underway to develop a Bay Area-wide IRWMP, there currently exists a cohesive regional plan for Eastern Contra Costa County (ECCC). Historically, hydrologically, and politically, Eastern Contra Costa County functions as a region in the SF Bay Area.

- ◆ There is a history of long-range integrated planning in ECCC. In the past decade, stakeholders developed relationships to work on regional issues. Cities, counties, water and sanitation districts, local non-profits, developers, environmentalists, and private landowners have worked to address land and

water issues. Ongoing regional planning addresses biodiversity, habitat conservation, flood control, water quality and water, and land use.

- ◆ ECCC is a hydrologically distinct region in the Bay area. The watersheds of Eastern Contra Costa County drain to the Delta, the source of almost 2/3^{rds} of California's drinking water.
- ◆ The East Contra Costa County region is a manageable size in which to fine tune and implement an IRWMP.

Please clarify that an implementation proposal from the Eastern Contra Costa region could meet standards outlined in the draft Guidelines.

3) Clarify participation in IRWM Plans: For the reasons provided in 2, it may be advantageous and necessary for an agency to participate in more than one IRWM Plan for different or overlapping regions (considering water management needs at different scales). Please clarify that this type of situation is acceptable.

4) Please clarify appropriate uses for planning money: If a region already has an IRWM Plan, but needs to further develop specific implementation project plans, is it appropriate to use the planning money for EIR/EIS? For scoping? For project development? For feasibility analysis?

5) Feedback on individual components of grant applications: Given the complexity of submitting regional grant applications, the grant review and awarding process should evaluate the proposals as a whole and individual components so that the overall applicant can tailor the ultimate regional project to reflect program priorities.

6) Grant administration costs should be indicated: Please confirm that lead organizations coordinating grants for multiple organizations can use awarded money to cover grant administration costs. Please indicate in the guidelines a limit (either dollar amount or percentage to total award.)

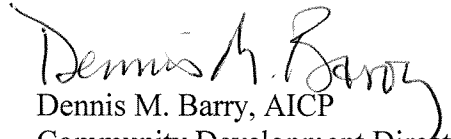
7) Form of IRWM Plan submission: IRWM Plans and functional equivalents can be very long. The final PSP should allow such documents to be submitted electronically on compact disk (CD).

8) Please Clarify required strategies to consider: On Page 13, the text above the last sentence before Table A-1 says: "Strategies to be considered COULD include specific strategies (emphasis added)." Addressing the same topic on Page 15, the 5th bullet indicates that all strategies must be considered. It says: "Documentation that the water management elements considered include.... Ecosystem restoration, AND environmental habitat (emphasis added)." This suggests that all strategies must be addressed in the IRWM plan and grant proposal. Many of these elements are not appropriate for all regions/project goals. . It should be clarified if all strategies / which strategies must be considered for the proposal to be considered for funding.

Please clarify these discrepancies and clarify if plans/proposals are required to demonstrate that all strategies were considered.

Thank you for this opportunity to provide comments on the Proposition 50, Chapter 8 Draft Guidelines. If you have questions regarding these comments, please contact Abigail Fateman at afate@cd.cccounty.us or (925) 335-1272.

Sincerely,

A handwritten signature in black ink that reads "Dennis M. Barry". The signature is written in a cursive style with a large, stylized "D" and "B".

Dennis M. Barry, AICP
Community Development Director
Contra Cost County